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22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA

24 IN RE: 23ANDME, INC. CUSTOMER DATA
25 SECURITY BREACH LITIGATION

26 This Document Relates to: ALL ACTIONS

No. 3:24-md-03098-EMC

**DECLARATION OF CARI CAMPEN
LAUFENBERG IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL RELATING TO THE
SUPPLEMENTAL BRIEF IN SUPPORT
OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Judge: Hon. Edward M. Chen
Courtroom: 5, 17th Floor

1 I, Cari Campen Laufenberg, declare and state as follows:

2 1. I am a partner at the law firm of Keller Rohrback L.L.P., and co-lead counsel to plaintiffs
3 in *In re: 23andMe, Inc. Customer Data Security Breach Litigation*, No. 23-md-03098-EMC (N.D.
4 Cal.). I am a member in good standing of the bar of the State of Washington and am admitted *pro hac*
5 *vice* in the above-captioned matter.

6 2. I have personal knowledge of the facts set forth herein and, if called as a witness, could
7 and would testify competently to them.

8 3. I submit this declaration in support of Plaintiffs' Administrative Motion to File
9 Documents under Seal Relating to Supplemental Brief in Support of Motion for Preliminary Approval
10 of Class Action Settlement ("Supplemental Brief"), and in accordance with Civil Local Rule 79-5.

11 4. Specifically, Plaintiffs seek to seal: (1) Verita's settlement administration bid in its
12 entirety (Ex. 3 to Supplemental Brief) and (2) limited redactions of references in the Supplemental
13 Brief to the cost of Privacy Shield.

14 5. Plaintiffs seek to file the settlement administration bid Verita submitted as part of the
15 Notice and Claims Administrator selection process under seal. While not a litigant, Verita's bid
16 contains detailed information regarding its projected costs for administering this Settlement on a task-
17 by-task basis which, if revealed, would cause harm to Verita's competitive standing. Additionally,
18 because Verita's total projected cost for administration of the Settlement has been included in publicly
19 filed documents with this Court (*see* Dkt. 103-1 at p. 39; Dkt. 103-6 at ¶ 49; Dkt. 111 at Section G) and
20 is included in the proposed Class Notice, Plaintiffs believe the Settlement Class will have sufficient
21 information to evaluate the cost of Verita's services in considering whether to participate in or object
22 to the Settlement.

23 6. Plaintiffs likewise seek to file under seal limited references in the Supplemental Brief
24 that would reveal the cost of Privacy Shield. CyEx is providing this monitoring product to Plaintiffs at,
25 or close to, cost. As such, revealing publicly the cost of Privacy Shield could serve to undermine
26 CyEx's competitive standing. CyEx advises that the Privacy Shield product, while not currently
27 available on the retail market, would retail for approximately \$375 per year per Settlement Class
28 Member. *See* Dkt. 103-7, Thompson Decl., ¶ 8. Regardless, Plaintiffs believe the retail value of Privacy

1 Shield provides a more useful measure by which Settlement Class Members can evaluate the benefit
2 of this monitoring product than does the fixed cost which Plaintiffs negotiated with CyEx.

3 7. True and correct copies of the following documents are attached as follows:

4 (1) A true and correct **unredacted** copy of Plaintiffs' Administrative Motion to File
5 Documents under Seal Relating to Supplemental Brief in Support of Motion for
6 Preliminary Approval of Class Action Settlement is attached hereto.

7 (2) A true and correct **unredacted** copy of Exhibit 3 to the Supplemental Brief in
8 Support of Motion for Preliminary Approval of Class Action Settlement is attached
9 hereto.

10 I declare under penalty of perjury under the laws of the United States that the foregoing is true
11 and correct.

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13 Executed this 2nd day of October, 2024 in Seattle, Washington.

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15 /s/ Cari Campen Laufenberg
16 Cari Campen Laufenberg
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